

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

_____)	
Mail Processing Network Rationalization)	Docket No. N2012-1
Service Changes, 2012)	
_____)	

**NATIONAL POSTAL MAIL HANDLERS UNION
REQUEST TO HAVE WITNESSES ADOPT TESTIMONY AND WRITTEN CROSS-
EXAMINATION IN WRITING**

The National Postal Mail Handlers Union (NPMHU) hereby respectfully requests that the Commission permit the seven NPMHU-sponsored witnesses to adopt their testimony via a sworn declaration, rather than by appearing as a live witness before the Commission. In support of this request, the NPMHU states as follows:

1. The NPMHU has sponsored the testimony of seven witnesses in this proceeding. Six of the witnesses are local union officials working and residing outside of the District of Columbia metropolitan area. Pursuant to the Commission June 8, 2012, Order, witnesses Hora and Broxton are currently scheduled to appear for cross-examination on June 14, 2012, and witnesses Hogrogian, Bentley, Haggerty, Wilkin, and Hayes are scheduled to appear for cross-examination on June 15, 2012.
2. On June 6, 2012, each of the NPMHU-sponsored witnesses filed, through counsel, written responses to Interrogatories posed by the Postal Service.
3. On June 8, 2012, the Postal Service submitted a Notice withdrawing its intention to conduct any cross-examination of the seven NPMHU-sponsored witnesses.

4. No other participant in this proceeding has submitted notice of intention to cross-examine the NPMHU-sponsored witnesses.

5. The NPMHU-sponsored witnesses are ready and available to travel to Washington, D.C., to appear before the Commission if the Commission members desire to question any witness regarding the matters presented his testimony. However, given that no participant in the proceeding currently intends to cross-examine any of the NPMHU-sponsored witnesses, if the Commission does not itself desire to question these witnesses, the NPMHU asks that they be excused from appearing.

6. If excused from appearing, each of the NPMHU-sponsored witnesses will submit a sworn declaration adopting his testimony, and attesting to the accuracy of any Interrogatories that any participant in the proceedings wishes to designate as written cross-examination. A similar process was permitted for Postal witness Kevin Rachel, who was unable to appear on the hearing date scheduled by the Commission and whom no participant sought to cross-examination.

Wherefore, the NPMHU respectfully requests that the Commission excuse these witnesses from appearing before the Commission and permit them to adopt their testimony via sworn declaration.

Respectfully submitted,

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As agent for and authorized by

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